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**CLERK, U.S. DISTRICT COURT**

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JAN 14 11 3:27  
CLERK  
U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF ILLINOIS**

JORDAN ANTONOV SAHATTCHIEVE, Ph.D,

Case No.:

Plaintiff,

**COMPLAINT, SO HELP ME GOD**

v.

WILBUR WRIGTH COLLEGE,

**1:19-cv-00326**

Defendant.

**Judge John J. Tharp, Jr**

**Magistrate Judge Sunil R. Harjani**

1. I, the plaintiff in the above titled action, currently reside at 5722 West Maple Avenue in Berkeley, Illinois 60163; my telephone number is 630-827-9316.

2. Wilbur Wright College, the defendant in the above titled action, is located at 4300 North Narragansett Avenue, Chicago, Illinois 60634. Wilbur Wright College's telephone number is 773-777-7900. The telephone number for the Office of the General Counsel of the City Colleges of Chicago is 312-553-2920.

3. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred upon this Court by 42 U.S.C. Section 2000e-5. Equitable relief and other relief is sought under 42 U.S.C. Section 2000e et seq. and other relevant sections of United States Federal Law, including Biblical precedent which may be used to adjudge this herein matter.

1           4.       Whosoever for a man ruleth, in these parts follow: Are ye of little faith? If ye  
2 object to my lawful and with due cause mention of and appeal to The LORD Almighty God and  
3 HIS eternal word, herein, self-recuse forthwith! For if thou doest not self-recuse, thou art an  
4 idolator or a non-repenting and/or non-penitent sinner. Thou shalt incur The LORD's Wrath.  
5 What form of smiting thou may suffer, I know not. I, having been baptized by a Bulgarian  
6 Orthodox man of faith in the name of the Father and of the Son and of the Holy Spirit when I  
7 was a child, which man has and/or was spiritually descended from The Christ Himself, in what  
8 mysterious way I know not, having received Holy Communion and an Anointing of the Sick,  
9 having confessed my sins<sup>+</sup> and repented therefor, I admonish thee magistrate, judge, or possibly  
10 thee non-penitent sinner, strike not any mention of The LORD, HIS eternal word, HIS Son, and  
11 the Holy Spirit Whose witness you here have petitioning for justice in this land. If you are a  
12 non-penitent sinner self-recuse and obtain a remission and/or absolution, of your sins, or  
13 whatever you call this act here in the land – not to be confused with tempting and/or committing  
14 sins with the men of faith working here so that you may have access to this relief. If thou art a  
15 woman – self-recuse, was not Eve who spoke to the serpent first?  
16 Further: I, having witnessed the powers of prophesy conferred upon me by The LORD, having  
17 seen thunderbolt and ball lightnings about my person in a week (or two), having witnessed the  
18 Holy Sprit in the form of a Dove on a Mountain in Bulgaria, and a glowing contour of The Son  
19 on my mother's blinds in her residence in the city of Sofia in Bulgaria, in which city I was born  
20 and baptized, have come to tell ye of little faith: The LORD Exists and HE is a Righteous God,  
21 HE is the God of Israel, the God of Avra'am, Isaac, and of Iakov. HE is my God too.

22       Addendum: Having done all of the above, having written all of the  
23 above, I now believe that The LORD is upset with me because  
24 I quit having gay sex and because excommunicated my gay friends  
25 from my life on other peoples' say so! I further believe that the  
26 Law of Moses applies to the Israelites only. I having loved the Jews  
27 with all my heart, yes they have led me into temptation and also love  
28 am prepared to be crucified on Golgotha if The LORD Almighty God  
needs my blood in addition to the blood of his Son whom we call Messiah  
so that the Israelites can be free from the proscription against  
homosexuality. I shall, in this eventuality, require disciples, and/or  
miracles to confirm that this 2 second crucifixion on Golgotha is needed



5. The acts complained of in this suit concern the termination of my employment at and by Wilbur Wright College, hereinafter "the college", without cause and without notice as well as the pain I endured as a result of the college's failure to provide reasonable accommodations for my disability disclosed at my initial hire on Form ~~CC~~<sup>C</sup>-305.\* Notwithstanding the manner of my termination, the events which immediately preceded it were as follows: On the day before my termination I was scheduled to teach an Intermediate Algebra Class at the college's campus located at the address given in this complaint recited in paragraph (2) above. Upon entering the classroom I asked the class to maintain silence during the course of my lecture as due to circumstances beyond my control, which had necessitated my solicitation of police assistance in manner conducive to the peaceful resolution of a domestic dispute previously arisen, I was possessed of less than my usual measure of comportment and had accordingly a lower threshold for the students' disruptive behavior. Despite my admonition, one of my former students, Ms. Aileen Gonzalez, started to heckle me by making a hissing noise behind my back as I was writing on the whiteboard. I asked Ms. Gonzalez to discontinue, she however did not. There was some exchange of words between the two of us, which I do not recall in detail, however, at the time I felt that Ms. Gonzalez was taking away valuable class time in attempting to engage me in a confrontational dialogue thereby challenging my authority to run the class in a manner I saw appropriate. I also felt at the time that her behavior was disruptive of class discipline. Because I had given Ms. Gonzalez a few (more than a couple) warnings, I headed to the Office of the Department Chair to seek further advice. Unfortunately, in the absence of the department's chairperson, Ms. Victoria Polotsky, I was only able to seek advice from the secretary of the department, Bertha, who also happened to be the most senior representative of this office present. I briefly described the situation to Bertha whereupon she told me to have Ms. Gonzalez removed by the college's security officers. I did exactly as advised, and the security officers removed Ms. Gonzalez from the classroom on my authority as the (adjunct) faculty member in charge of teaching this section of Intermediate Algebra. I also believe that my students in my former section of Intermediate Algebra also, as a practical joke, perhaps inspired or perpetrated by Ms. Gonzalez, or other disruptive students, moved the classroom clock an hour

\* Addendum and amplification on the ~~description above~~ aforesaid:  
 I do not currently, at the time of signing of this complaint, ~~if the recall~~  
 if actual form used by the college was indeed C-305; it was a form which  
 contained much of the same intent; namely, it was a disclosure of disability.  
 [COMPLAINT]

1 or so ahead, so that I ended up dismissing class an hour early!

2       The second incident which happened on the day preceding my termination was a verbal  
3 altercation at the reprographics office where the only person present and working had  
4 demonstrated discourteous attitude by not addressing my call for attention in attempting to  
5 submit for printing my syllabus for the Intermediate Algebra class. Furthermore, after not filling  
6 out the necessary paperwork prior to making my verbal request for the use of the copier, because  
7 of a lack of knowledge and guidance on the matter, I was slighted by the person left in charge.  
8 This incident resulted in the measured raising of my voice in protestation to the discourteous  
9 attitude ill-behooving the presumed honors afforded by my academic title. Because the college  
10 had reached out to me regarding its teaching needs less than a week before the first day of class  
11 and because I was not allowed to enter the classroom until my urine analysis had cleared, I was  
12 already behind with the preparation of the class materials and was therefore under increased  
13 pressure to adhere to the departmental guidelines and have the course syllabus distributed in the  
14 fastest manner possible. The department was on the one hand tardy in providing me with  
15 printing credentials while on the other mindful of and insistent on my adherence to its deadlines  
16 for providing syllabi to the students.



1           The last significant incident that day happened in my office when I had begun to feel a  
2 burning sensation on my face. All of this resulted in a rather bad day at work. When I had left  
3 the college, I was at home in Berkeley and had decided to do some reading and research at the  
4 Berkeley Public Library. On my way to the library I became aware of a burning sensation on my  
5 face. I asked one of the librarians, Loretta, if she noticed any swelling of my face and she  
6 answered in the affirmative pointing to a noticeable swelling on one side. The burning sensation  
7 had started when I was still at the college and was, I believe, related to my body's response to the  
8 stress caused by my class' behavior and the department inappropriate reaction. On Loretta's  
9 advice, I headed to the Elmhurst Memorial Hospital's Emergency Room, and was given a  
10 prescription for Benadryl by the attending physician. The attending physician also reaffirmed  
11 my suspicion that my body's response to undue stress had resulted in this inflammation-like  
12 reaction. The agent suspected to have caused the swelling was *acetylcholine* according to the  
13 attending physician.

1           6.       In addition to the acts of discrimination herein complained of and the  
2 psychological distress which caused the pain and suffering aforementioned, and the tarnishing of  
3 my professional reputation which has taken me years (twelve years to be exact) of hard work to  
4 build up, I also suffered a rescision, in other words - one count of rescinding of a conditional job  
5 offer extended to me by the National Security Agency. The annual salary in this offer was over  
6 \$100,000 per annum. The job offer was made to me prior to my employment by the  
7 aforementioned college, thus far the only defendant in this suit, and was rescinded shortly after  
8 the college's act of discriminatory termination as a result of it. Consider this: The National  
9 Security Agency, hereinafter the Agency, made its offer of employment to me upon my passing  
10 of the non-trivial (read hard) Mathematics Proficiency Examination (MPE), the submission of  
11 certain credentials, such as a curriculum vitae, a resume, transcripts which I paid \$12.00 for the  
12 procurement of in behalf of the Agency, and letters of recommendation from three of the world's  
13 leading experts in their respective mathematical fields addressed to the top level military officers  
14 in charge of the Agency submitted to the attention of the Office of the Human Resources, as well  
15 as a personal reference from a friend who employed me when no college would and when I was  
16 in some need of a source of income! All of this I did in order to serve my country, which I have  
17 given an Oath of Allegiance to and consequently been released of dual citizenship for! This  
18 accursed college has cost me a lot more than my academic reputation. Further, I have cause to  
19 believe that they (the college) acted out of malice and in bad faith. On this topic of faith, please  
20 see Paragraph 4 above.

1           7.       I, therefore, ask this court to award me damages, restitutions, issue injunctions,  
 2 orders, hold hearings here or elsewhere at a place where I am able to have cheapest access to,  
 3 appoint counsel in good faith at no charge to me, see Paragraph 4 above, and afford me access to  
 4 repositories of legal precedence applicable to this here suit. I shall ask for the maximum  
 5 applicable damages to be awarded, which shall be disbursed in as follows: for the ill, for the  
 6 homeless, and for myself the pauper who am ill and was homeless. I herewith ask for  
 7 injunctions against one Elizabeth Budde, social worker at Presence Health, who together with  
 8 the Police Department of The Village of Berkeley did there infringe upon my right of due  
 9 process, had me deprived of liberty and caused me, through her malicious lies, to undergo a  
 10 mental health evaluation by people of bad or no faith at a facility which denied my so-called  
 11 "patient rights" and verbally assaulted me <sup>with</sup> ~~by~~ rogue orderlies, medicated me against my will by use  
 12 of intimidation, and put me in the presence of people who have no God-given or Any Other right  
 13 to be there (in my presence), whose company I neither solicited nor enjoyed; which Elizabeth  
 14 Budde having lied the purposes therefor has recently refused to answer my in-good-faith  
 15 questions as to how she obtained her writ, or whatever you call her unlawfully procured  
 16 document in this here State!

17           8.       The defendant's conduct is discriminatory with respect to a disability – social  
 18 anxiety disorder.

19           9.       The last act of discrimination occurred on September 21<sup>st</sup>, 2018 – it was the  
 20 termination of my employment at the college. As a no-less-than partial consequence of this act,  
 21 I also suffered a loss of a conditional job offer with the United States government contingent  
 22 upon the successful interview by a committee of my peers.  
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 27  
 28



10. I, the petitioner, prosecutor, and the <sup>sin-free</sup> ~~now-righteous~~ man, demand a jury of my peers: men of good faith consistent with my definition thereof in Paragraph 4 above, who are scholars who have attained the degree Doctor of Philosophy in Mathematics, and who are of good moral character and pleasant disposition and are citizens of The United States of America and of no other nation, principality, et cetera. In the event that such jury cannot be convened, for lack of peers in this land, feel free in good conscience to dismiss this suit and add insult to my injuries hereto sustained. If this be the case, I shall repent for ever believing in this Nation its laws and its Faith.

Dated: January 8<sup>th</sup>, 2019 AD

at Elmhurst, Illinois

By: Jordan Salathiel, Ph.D.  
Plaintiff

NOTE ↘ NOT ENTIRELY CORRECT  
This complaint contains 8 (eight) pages and 10 (ten) numbered paragraphs.  
It also has 5 (five) handwritten corrections below enumerated:  
(a) on line 4 of page 3, it contains the insertion of an asterisk pointing to a footnote;  
(b) below line 28 but above the bottom-of-page delineator, it contains the footnote described in (a) above, all of this fully contained on page 3;  
(c) on line 1 of page 7, it contains the correction of the noun "injunctio" put into its plural form;  
(d) on page 7, line 11 quotation marks have been inserted around the words 'public rights', the word 'by' has been struck from the ~~second~~ page and was thereafter replaced with the word 'with' written in ink (blue ink) above it.  
The back of each of these here pages has been left blank out of deference for what the Plaintiff, who is I, still believes to be a just court, this being a test upon it.

Signed at 6:27 pm by Jordan Salathiel, Ph.D. Jordan Salathiel

It further contains these corrections: my now-defunct phone number on the upper left-hand corner of page 1 has been crossed out in black. The crossed out 'C' was reinstated in black ink. I also attest under penalty of perjury that the college required the completion of this identical forms CC-305 or an equivalent thereof. Signed at 7:23 pm at Berkeley, Illinois: Jordan Salathiel

Finally, it contains an **ESSENTIAL** amendment to paragraph 4. Signed: Jordan Salathiel  
January 9<sup>th</sup>, 2019 after the Christ.